

MELINDA HAAG (CABN 132612)  
United States Attorney

MIRANDA KANE (CABN 150630)  
Chief, Criminal Division

KESLIE STEWART (CABN 184090)  
Assistant United States Attorney

1301 Clay Street, Suite 340S  
Oakland, CA 94612  
Telephone: (510) 637-3680  
Fax: (510) 637-3724  
E-Mail: Keslie.Stewart@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR10-00787 PJH
	)	
v.	)	STIPULATION AND <del>PROPOSED</del>
	)	ORDER EXCLUDING TIME FROM
MICHAEL BATISTE, JR.,	)	FEBRUARY 23, 2011 THROUGH
COREY LAMONT CHAFFIN,	)	MARCH 16, 2011 FROM SPEEDY TRIAL
AARON MICHAEL HALL, and	)	ACT CALCULATION (18 U.S.C. §§
AMANDA REANE RODRIGUEZ,	)	3161(h)(7)(A) and (B))
	)	
Defendants.	)	

The parties appeared before Magistrate Judge Donna M. Ryu on December 15, 2010, for status. Given the voluminous nature of the discovery, the parties agreed that the matter should be continued to February 23, 2010 and that time should be excluded for the effective preparation of counsel. Defense counsel continue to review discovery, and now agree that a further continuance to March 16, 2011 is warranted. Accordingly, the parties agree that it is unreasonable to expect adequate preparation for pretrial proceedings or trial within the time limits of the Speedy Trial Act.

The parties therefore stipulate to the following:

1. This matter is complex within the meaning of the Speedy Trial Act and an

1 exclusion of time for effective preparation of counsel is appropriate to allow defense counsel  
2 time to review the voluminous discovery, taking into account the exercise of due diligence.

3 2. The parties further agree that the ends of justice served by excluding the period  
4 from February 23, 2011, through March 16, 2011, from Speedy Trial Act calculations outweighs  
5 the interests of the public and the defendants in a speedy trial by allowing time for the defense  
6 effectively to prepare the case, in accordance with 18 U.S.C. §§ 3161(h)(7)(A) and (B).

7 SO STIPULATED.

8 Dated: February 22, 2011

9 /s/  
KESLIE STEWART  
Assistant United States Attorney

11 Dated: February \_\_, 2010

12 ANGELA HANSEN  
Counsel to Defendant Batiste

14 Dated: February \_\_, 2010

15 DIANA WEISS  
Counsel to Defendant Hall

16 Dated: February \_\_, 2010

17 LAUREL HEADLEY  
Counsel to Defendant Chaffin

19 Dated: February \_\_, 2010

20 RANDALL KNOX  
Counsel to Defendant Rodriguez

22 **~~PROPOSED~~ ORDER**

23 Based on the stipulation of the parties and good cause appearing, the Court finds that the  
24 ends of justice served by excluding the period from February 23, 2011, through March 16, 2011,  
25 from Speedy Trial Act calculations outweighs the interests of the public and the defendant in a  
26 speedy trial by allowing time for the defense effectively to prepare the complex case, in  
27 accordance with 18 U.S.C. § 3161(h)(7)(A) and (B).  
28

1           Accordingly, this matter is ordered set for status before magistrate Judge Donna M. Ryu  
2 on March 16, 2011 at 9:30 a.m. and the time from February 23, 2011, through March 16, 2011,  
3 shall be excluded from the Speedy Trial Act calculations, pursuant to 18 U.S.C. § 3161(h)(7)(A)  
4 and (B).

5           IT IS SO ORDERED.

6 DATED: February 22, 2011

7   
LAUREL BEELER  
United States Magistrate Judge